

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ESTATE OF JAY ANDERSON, JR.
by Special Administrator, Starkeisha DeLaRosa;
J.A. minor child, through her next friend Starkeisha DeLaRosa,

Plaintiffs,

CASE NO. 2:21-cv-00848

v.

CITY OF WAUWATOSA,
JOSEPH ANTHONY MENSAH, and
FORMER CHIEF OF POLICE BARRY WEBER,

Defendants.

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants, by their attorneys, Wirth + Baynard, respectfully move the Court, the Honorable Lynn Adelman presiding, for an order dismissing Plaintiffs' Amended Complaint, (ECF No. 47), in its entirety, including all claims alleged against the Defendants, on the merits and with prejudice pursuant to Fed. R. Civ. P. 56.

This Motion is supported by the following:

1. Defendant's Memorandum in Support of Motion for Summary Judgment;
2. Defendant's Proposed Findings of Fact in Support of Motion for Summary Judgment;
3. Supplemental Declaration of Jasmyne M. Baynard, with exhibits;
4. ECF 76 through 76-25, Declaration of Joseph Roy, with exhibits; and
5. ECF 77 – 77-11, Declaration of Jasmyne M. Baynard, with exhibits.

Through this Motion, the Defendants also seek the costs and disbursements of this Motion and action.

Dated this 24th day of July 2023.

WIRTH + BAYNARD
Attorneys for Defendants

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